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August 28, 2012

VIA ECF

Honorable James Orenstein  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York

**Re: Allen Stein v. American General Life Insurance Company**  
**Docket No.: 11-cv-6009(DLI)(JO)**

Dear Judge Orenstein:

This firm represents plaintiff, Allen Stein as Trustee of the Rachel Meisels Irrevocable Trust. We served defendant with the 30(b)(6) notice on July 3, 2012. It was not until August 27, 2012, two days before the scheduled deposition that defendant objected to topics contained in the notice.

We are going forward with the deposition on August 29, 2012 and respectfully request that the Court be available if issues arise during the deposition.

Very truly yours

LIPSIUS-BENHAIM LAW, LLP

Cheryl D. Lipsius

CDL/lis